

**Southern Internet, Inc. Comments Regarding Notice of Proposed Rulemaking  
GN Docket No. 17-258 (Citizens Broadband Radio Service)**

Southern Internet, operating in the Atlanta metropolitan area, services a rural community that sits in the shadow of the world's busiest airport. We provide wireless Internet access using 3650-3700MHz under an NN license, and 100% of our residential customers access the Internet using this spectrum. This community, with 2500-3000 residents and approximately 1200 total houses, is unserved or underserved by other wireless and wireline providers, which created the opportunity for investment and efficient spectrum use by utilizing frequencies that were otherwise unoccupied in the area.

Our future growth and investment are dependent upon the licensing scheme of the CBRS band. We spent over \$100,000 to build and operate a network based on the Commission's earlier work on CBRS, and through following trade associations like the Wireless Innovation Forum.

**License Term**

Our largest demographic are residential customers in this rural community. And, as a company serving a rural community so close to a major metropolitan area, we are aware of the pressures that real estate development places on landowners. The demand for fixed wireless broadband service could quickly change if a large residential development happened within our service area. Density brings the need for greater aggregate bandwidth, which favors technologies like cable and FTTH, and fixed wireless is ill-equipped to compete with those types of deployments.

As such, license terms of 3 years are most appropriate for our needs. This shorter term encourages quick construction of facilities to offer service in this band, and it actively discourages speculation that would “lock up” spectrum as a defensive measure against future competitors as needs beyond 3 years are difficult to predict at a microeconomic level. We built our first site in under 2 months and brought a second site online within a month of identifying its location. Bidding on a PAL would necessarily imply that we would continue construction and expansion as soon as it was issued. We would put the license to immediate use and not hold it as a hedge against potential future development.

### **Geography**

Geographic boundaries for spectrum bids are best served under the earlier proposal that called for *census tract* basis instead of a *county* or that of a *Partial Economic Area*. Our service area falls within the PEA that covers the Atlanta metropolitan area and that of one of two counties that comprise the City of Atlanta. As such, bidding on a license that covered the larger territory would be:

#### *1) Inefficient.*

If we bid on a County or PEA basis, we would bid on spectrum that covers hundreds of thousands of Americans, when we seek to serve only 3,000.

Consequently, if we won, we would be allowing significant bandwidth to be dormant throughout much of the region while we focused on our core area of operations.

### *2) Economically Disadvantageous.*

We seek to continue servicing a rural community, and the density and economics of servicing that group is at odds with the demands of urban and suburban communities. As such, bidding on a PAL for the region would be prohibitively expensive, and would be a cost that is ultimately passed on to our customers.

### *3) Service Disparity.*

Offering channels at the county or PEA level would necessarily drive up the costs for spectrum at auction because of the larger geography, which would result in the winning bidder focusing their development on only the densest areas to justify the investment. That necessarily means that the winning bidder would not be able to justify the return on investment for construction of a network to serve the rural parts of their territory.

## **Summary**

Southern Internet is in a unique and challenging situation. Increasing the license term might make the service area appealing enough, on a longer timescale, that the cost of spectrum would be increased to the point that we cannot obtain a PAL. Similarly, larger geographic areas would drive up the cost of a PAL to the point we cannot obtain one. When looking at a map, it might appear that we are “part of Atlanta,” but our service area is a world apart and the last rural community within the metro region. This community seeks to preserve the rural character of the area, and we seek to continue serving them.

We ask the Commission to preserve the original rules proposed under CBRS.